

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
NORTHER DIVISION

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UNITED STATES OF AMERICA,

CR 19-10013

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

CANDACE CROW GHOST,

Defendant.

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The Defendant states that the following facts are true, and the parties agree that they establish a factual basis for the offense(s) to which the Defendant is pleading guilty pursuant to Fed. R. Crim. P. 11(b)(3).

On or about between the 21st day of December, 2016, and the 27th day of March, 2017, in Corson County, in the District of South Dakota, Candace Crow Ghost, being an employee of the Grand River Casino, a gaming establishment operated by and for and licensed by an Indian tribe pursuant to an ordinance and resolution approved by the National Indian Gaming Commission, did embezzle, abstract, purloin, willfully misapply, and take and carry away with intent to steal moneys, funds, assets, and other property of said casino, in excess of \$1,000, in violation of 18 U.S.C. § 1168(b).

On October 4, 2016, Candace Crow Ghost, the Defendant, was hired as the Marketing Director for the Grand River Casino, located on the Standing Rock Sioux Indian Reservation. As part of her duties/authority, the Defendant had

the ability to adjust “points” on individual players club rewards cards. The points carried a cash value, allowing players to redeem points at the rate of 100 points per dollar.

The Defendant began purchasing prescription pain pills from numerous people within the first few months of her employment. The Defendant would pay for the pills she received by using her positional authority at the casino to adjust the player points balance on the individuals’ players club reward cards and then issue them vouchers to redeem the points for cash. The scheme was discovered and the Defendant was terminated from her position in March of 2017.

The casino developed a list of suspicious transactions and compiled a list of 10 individuals who were ultimately banned from the casino based upon the Defendant’s actions of inappropriately adjusting their players’ club points. In the short time that she worked at the casino, the Defendant improperly added 426,000 points to various player accounts, costing the casino \$4,260. In addition, the Defendant comped another \$1,040.83 in rooms and meals. The people identified by the casino as receiving improper benefits are:

| <b>NAME</b> | <b>POINTS</b> | <b>VALUE</b> | <b>COMPS</b> | <b>TOTAL</b> |
|-------------|---------------|--------------|--------------|--------------|
| M. M., Jr.  | 133,000       | \$1,330      | \$102.60     | \$1,432.50   |
| K. C. N.    | 147,000       | \$1,470      | \$413.41     | \$1,883.41   |
| Q. B. O.    | 49,000        | \$490        | \$157.14     | \$647.14     |
| J. R.       | 20,000        | \$200        | \$208.67     | \$408.67     |
| E. R., Sr.  | 8,000         | \$80         | \$28.45      | \$108.45     |
| H. M., Sr.  | 16,000        | \$160        | \$14.75      | \$174.75     |
| C. C.       | 30,000        | \$300        | \$17.95      | \$317.95     |
| Y. S.       | 3,000         | \$30         | \$7.75       | \$37.75      |


|               |         |         |            |            |
|---------------|---------|---------|------------|------------|
| M. Y.         | 9,000   | \$90    | N/A        | \$90       |
| R. O. F.      | 11,000  | \$110   | N/A        | \$110      |
| G. C. G.      | N/A     | N/A     | \$90.11    | \$90.11    |
| <b>TOTALS</b> | 426,000 | \$4,260 | \$1,040.83 | \$5,300.83 |

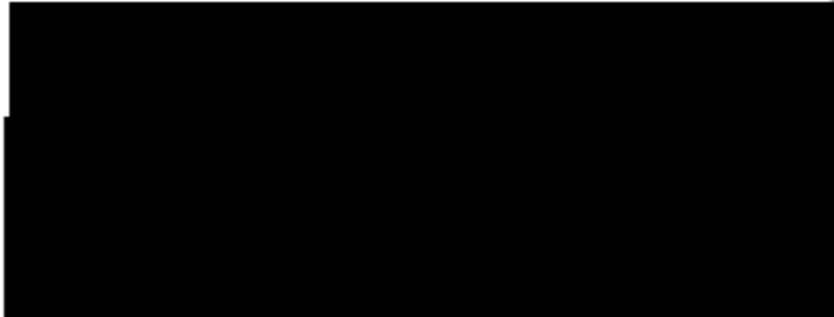
The Defendant was interviewed by the FBI and admitted to adjusting the player points, as listed in the above table, in order to purchase prescription pain pills. The Defendant paid various people \$25 for a 10 mg pill of Oxycodone, \$15 for a 10 mg pill of Hydrocodone, and \$10 for a 5 mg pill of Hydrocodone. When “customers” would come to the casino with pills, they would message the Defendant and she would meet them on the casino floor. The Defendant would direct her “customers” to an area without cameras for the pill exchange. Once she received the pills, the Defendant would then go to the player’s club window, adjust the points on that patron’s rewards card, prepare a voucher redeeming the points for cash, and finally bring them to the cashier’s window to redeem the voucher.

The Defendant acknowledges that she did not have authorization to adjust player points for pills, and knew she was converting casino monies to her own use and/or for her own benefit. The Defendant further acknowledges that the Grand River Casino is a duly authorized gaming establishment on Indian land, of which she was an officer or employee during all relevant times.

RONALD A. PARSONS, JR.  
United States Attorney

7/24/19  
Date

  
Troy R. Morley  
Assistant United States Attorney



8-7-19  
Date

  
Candace Crow Ghost  
Defendant

8-7-19  
Date

  
Randall Turner  
Attorney for Defendant